

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MAR OIL COMPANY,

Plaintiff,

CASE NO. 3:11-cv-1261

v.

JUDGE JAMES G. CARR

MYRON KORPAN, et al.,

Defendants,

**MAR OIL COMPANY'S
MEMORANDUM IN SUPPORT OF
ITS MOTION FOR DEFAULT
JUDGMENT AGAINST NATIONAL
ENERGY, INC. AND GULFLINK, LLC**

MOTION FOR DEFAULT JUDGMENT

Pursuant to Federal Rule of Civil Procedure 55(b)(1), and for the reasons stated in the Memorandum in Support of Motion for Default Judgment filed contemporaneously herewith, Plaintiff respectfully moves this Court for entry of default judgment against Defendants National Energy and Gulflink as follows:

- (a) \$2,910,953 in compensatory damages;
- (b) \$8,732,859 in treble damages pursuant to Ohio Rev. Code § 1333.63(B); and
- (c) Plaintiff's reasonable attorney's fees and costs, pursuant to Ohio Rev. Code § 1333.64(C), set forth in Plaintiff's Statement of Fees and Costs filed simultaneously herewith, in the amount to be determined by the Court.

This motion is supported by the Affidavit of Mar Oil's CEO Wayne Toole attached as Exhibit 1 to the Memorandum in Support of Motion for Default Judgment filed contemporaneously herewith, which establish Plaintiff's claims for relief, and Plaintiff's Statement of Fees and Costs

filed simultaneously herewith, which supports Plaintiff's request for reasonable attorneys' fees and costs.

Dated: October 13, 2015

MAR OIL COMPANY

By: /s/ Maryia Y. Jones

Of Counsel

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MAR OIL COMPANY,)	Case No. 3:11-cv-1261
)	
Plaintiff,)	Judge James G. Carr
)	
v.)	CERTIFICATE OF SERVICE
)	
MYRON KORPAN, et al.)	
)	
Defendants.)	

This is to certify that on October 13, 2015, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Maryia Jones

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